

96

THE HUMBLE
ADDRESSE
AND *Passim*
Remonstrance
OF
RICHARD DAWSON

Gentleman, now Prisoner in the FLEET.

To the Right Honourable the Lords &
Commons in Parliament Assembled.

With all possible Submission, Representing the sad
Oppressures under which he groans, his Estate being
pluckt away from him by Injustice, Perjury, and
Subornation thereto, Forgery, Counterfeiting
his Hand and Seal, and other Unjust, Illegal
Unconscionable Grievances;

By the [redacted] Confederacy of Roger Por-
tington Gentleman, Philip Read Attorney of the Kings
Bench, Edward, and Francis Luttrell, Solicitor, and
Counsellor of Law, Sir John Lenthall Knight
Marshall of the Kings Bench, and others, set
on, incouraged, and defended by them.

*Because of the Cry of the Oppressed, and the Groans of Prisoners, I
will Arise saith the Lord.*

Let God Arise, and His Enemies will be Scattered.

London. Printed for the Author 1661.

THE HANDBOOK
ADDRESSED
TO
RECOMMENDATION

RICHARD WAGEN

Geometer, now Professor of the English

To the Right Honourable the Lord

Commons in Parliament, Attorney

With all possible expedition, Reciting the last

Opus, that may be done with the present power

which may now be had of the English

Parliament, for the recovery of the

late King, Richard, II.

By the Right Honourable

George Cawley, Esq; the

Arch, Surveyor, the

Commons, for the recovery of the

late King, Richard, II.

With the like intent, and for the same purpose

as the former, and for the same purpose

as the former, and for the same purpose

as the former, and for the same purpose

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Right Honorable Lords, and Worthy Gentlemen;

 THE External happynesse of mankind, consisting in Society, of which the briale, or check, is the Law, which carbes and restrains the untruly exorbitances of unreasonable men; what can befall more miserable in this life, than to have this remedy (by the Injustice of its Execution) made worse than the disease? to find Judgement turn'd into Gall and Wormwood, as is evident in your poor Petitioners Case, who to the ruine of his Wife and Children, hath for several years found experimental proof thereof, which being his lot in those times, when our Sun of Earthly happynesse was eclipsed, and only the Screechowles of Horror and Distraction were heard in our almost ruined Land; when Corruption and Villany was the natural milk to feed our Infant Monaster the Commonwealth; His hope and assurance is, that the return of our Sun of Majesty, will be like unto that of him, who hath been, and is his true pattern, the Sun of Righteousnesse, with healing under his wings, to poor, oppressed, and otherwise despairing Prisoners, among whose number, your Petitioner humbly acknowledgeth himself.

Nor is he only prickt forward to this Addresse, by the sharpnesse and tediousnesse of his sufferings, and present distres brought upon him thereby; but is also encouraged (nay more) assured of successse, in confidence of your Honors true Gallantry, Justice and Wisdom, who your selves in these late overturning times, have tasted of the same cup of affliction, many of you drunk thereof deeply.

Yea, His Most Sacred Majesty, hath not escaped the same
VII. 2

Lot ; but (in imitation of our Saviour , his immediate Lord and pattern) hath suffered in the like kind , (though not in the same manner) and therefore my confident assurance is , that having in this Humble Addresse to deal with such a King , the like of whom *England* never saw , nor brought forth , experimentally (by Gods inscrutable providence) made sensible of the distresses and sufferings of his meanest Subjects , such Lords and Nobles , who themselves have been tryed in the same Furnace of Affliction , and for many years last past , have (not through their Princes displeasure ; but for being Loyal to their Prince) by the meanest and worst of *Plebeians* been plundered , and stript of all , and afterwards imprisoned , with as much reproach and contempr , as if they had been Chips of the same Block with the most Contemptible Commoner : Such Knights and Burgesses to Sit in Parliament , who if in these times of distraction , they lived in *England* , and are unacquainted with the miseries of Imprisonment , it argues in them little Cordial Fidelity to their Sovereign Lord , or his Father of Blessed memory , whose real friends mildest Lot was reiterated , and severe Imprisonments , others being Banished , not a few Murthered .

On which Considerations , your Humble Petitioner begs of , and Humbly beseecheth you , who by the good hand of our most Gracious God , have been dragged , many of you out of the Dungeon , some recalled from Exile , to injoy your Antient Priviledges and Freedoms , and sit (according to your true desert and merits) at the Helm of State , to cast back your Gracious Eyes upon such who once were fellow Sufferers with you , and not (like *Pharaohs* Butler) being now your selves restored , to forget the languishing Estate of *Joseph* , (viz.) your once fellow Prisoner .

This my Lords and Honorable Gentlemen , I speak not as in the least doubting or fearing any such thing ; but out of the mere sense of my long , and most unjust suffering ; pardon my boldnesse that I am thus importunate (if possible) to find an effectual and speedy remedy .

And not to trouble your Honours with a long Preamble , whose very weighty occasions , cannot admit a tedious discourse , I shall come Humbly to represent my Grievances , so illegal , so many

many, and carried on with a high hand, on purpose to ruine your Petitioner, whom several persons of note and power, have confederated to undoe and destroy, in so barbarous, and wickedly malicious a manner and way, as I question not, but in the following particulars to make so plainly evident to your Honors and Wisdoms, as will cause your hearts in reading of them to relent, and commiserate your poor Petitioners Case, yea so to pity him, as effectually to relieve him.

In the year of our Lord 1648 Octob. 21. Richard Dawson Gentleman, then residing in the County of Norfolk, and dealing in the Capacity of a Grasier, had at one time, forcibly taken from him 267 Oxen, which were all driven into the Castle of Pomfret, by some who pretended themselves Souldiers of that place, and there came to the possession of one Roger Portington, the Governour denying, that he had any thing to do with them, when Dawson (owner of the Cattle,) demanded them of him; but sent him to Portington, to treat with him concerning them, being (as he affirmed) wholly in his power, and withall required Portington to restore them to Dawson, but he refused to return them, or any part of them, using this exasperating expression, to the owners face, *That would he give 100 l. for ten of the worſt, he ſhould not have them;* with which most rugged answer, Dawson being justly provoked, (as well as exasperated by his great losſe) in the year 1649, he brought his Action of Tresor and Conversion against Portington, which being tryed by *Nisi prius*, at Guild Hall, in the year 1650. the Plaintiff recovered, againſt the Defendant Portington, (with costs of Suit) 1297 l. 13 s. 4 d. according to which verdict, Judgment was entered, and Dawson had granted him a Writ of Execution thereupon.

A man would now have thought that the Plaintiff had not been far from his money, having able bail for bringing forth the Body of the Defendant, and him a man of ſufficient estate to ſatisfie a greater debt; But the ſequel of this diſcourse will make it moſt evident, that as our Laws have been, and are in the Execution of them ſtill abuſed, there is no Case, ſo noſtrouſly corrupt and iuſt; but meeting with a ſuitable Conſcience, joyned with ability of Purſe, he may be provided with Lawyers, who for the ſake of gain, will maintain and defend the ſame, in deſpight of Juſtice.

For

For this *Perrington* to discharge his *Bayl*, rendered himself Prisoner to the *Kings Bench*, where *Dawson* charged him in Execution, upon the fore-recited Judgement, and there he to this time continues a Prisoner, although for many years he hath been, and still is at large, dwelling at his own house in *Yorkshire*, to the defrauding, and great damage, of the injured Creditor, who can look upon such actions, no otherwise than Cheats, however seemingly backt with Colour of Law; But of this I shall have cause given to speak more fully hereafter in this discourse: I will now come to shew by what vexatious troubles, the Condemned Defendant, hath for ten years molested the greatly suffering Plaintiff, by which he hath been out to so much cost, (besides molestation,) that he had better have been himself Condemned in as much more money, and clearly lost his debt, then recovered against the Defendant that Judgement, of 1397 l. 13 s. 4 d. For to avoid payment thereof, the Defendant *Perrington* hath not only himself endeavoured, but combined with others, to bring *Dawson* to ruine, and hath effected it, so far as tedious Law-Suits, and Imprisonments could do the same, to the Expence and Dammage of him, the fore-named Plaintiff, more than 8000 l. which he can make appear; and this by such monstrous courses of Villany, as can scarce be believed, but that the Plaintiff can by many Records make out the same.

His first vexations Dog-trick was, when that invention of *Salter's Hall* was hatched, for the relief (as was pretended) of Creditors and Debtors: To these Commissioners *Perrington* Ad-dressed himself by Petition, which was granted, and *Dawson* Summoned thereupon, to have the Cause heard by them, who instead of relieving the Creditor, ordered only a rehearing of the Cause before themselves, to which order (patience perforce) *Dawson* submitted; but the event proved neither relief to Creditor, or Debtor; for that Court after hearing the Cause, and with mature deliberation weighing the merits thereof on both sides, dismiss *Perrington's* Petition, which cooled his hopes and expectation of relief; and for the Creditor *Dawson*, all his relief was, that after the expence of 200 l. in that second hearing and Tryal, (several of his Witnesses living 200 miles from *London*, besides other ways of great charge and cost) he had only his

his former Judgement confirmed, and yet is far from his money as before.

This Dog-trick failing, *Portington* was soon provided with another, which was, to Petition the Usurper *Oliver* for relief against so due a debt doubly now confirmed by two Tryals; in which Petition(being on Record, and the Copy of it in *Dawsons* hands, to be shewed any that desire satisfaction therein,) *Portington* (to his praise be it spoken) who would by all means be thought a Cordial Royalist, did basely, and perfidiously acknowledge the Supreme Legislative Power to be in that bloody Rebel; betraying both his Conscience, and the Cause he pretend-
ed to maintain, with design only to cheat his Creditor *Dawson* of a just debt, so injuriously detained. The Usurper, in answer to his Petition, ordered several references: In attendance upon which, the Creditor was put to a new charge of 100*l.* or there-
about, the Prisoner finding as little relief, as he before had at *Sakers-Hall* (that is none at all) nor do I believe he ever ex-
pected relief from either, only used these delatory means, if not to defraud, at least to retard his Creditor from getting, what by Law he had recovered; and by multiplying expensive proceedings (although illegal) to weary him out, and tire his patience, seeing more monies dayly thrown away after the for-
mer, of which he could now have but little hopes, to receive ei-
ther Principal, Interest, or Costs of Suit.

Yet for all these disappointments, he is not weary; but since his Majesties happy Restauration, presented his Petition against *Dawson* in the Upper House of Parliament, where the Lords after several hearings, thought no relief fit to be granted in the Case, wherein the Law had no less than twice had its full, and due course; however, his restless spirit hath lately prompted to him another poor shift, and that is, to bring an *Auditor quare-
la*, in which he pretends an acquittance by the Act of Indemp-
nity, although he hath been a Prisoner in Execution (there-
fore) now above ten years since he was first charged there-
with.

Howbeit, although I call him a Prisoner, yet (thanks to good Sir John Lenthal) he is one at large; this Gentleman when great Rogues come to be Cannonized, shall pass for a pretious Saint, the rules of whose Prison, where he meets with one like himself, that

that makes no more Conscience of giving, than he of taking a bribe, reach as far as *Constantinople*, some say to the *East-India's*, by which means, those who can dispense with their Consciences, value the Execution of the Law not a rush; as particularly appears in *Portington*, who being suffered (though in Execution) to live at home, and sometimes for nigh three years together, not to come so much as to Town, hath taken up a resolution, never to pay his Creditor *Dawson* a groat, yet boasts, that he can, and will have his Liberty in spight o' him, although the hopes of *Dawson* are, that this Parliament will take such effectual course against these kind of tricks, as may truly relieve the oppressed, and curb the insolencies o' unconscionable men.

And so at present I shall leave my first Customer of this kind, and proceed to new, and more prodigious Villanies, acted by others, but countenanced and fomented by this *Portington*, who to secure himself in his unjust proceedings, hath not been backward, in the most hellish designs to act his part, to the shame of those who have abetted him, and his Associates, who were men of Rank and Repute.

In the year of our Lord 1656. Novemb. 11. *Dawson* being then in *Norfolk*, had occasion to make use of three hundred pounds for the manageing of his Trade, which he offered to repay in *London* by Exchange nine days after; which Sum, one *Phillip Read*, an Attorney in the Court of the *Kings Bench*, undertook to furnish him with all, in two dayes time, provided *Dawson* would give him a Warrant to an Attorney to confess a Judgement to him for five hundred pounds, (with a Defeasance, for nine dayes) for his better security of the payment of the said 300*l.* which *Dawson* consented to, Signed and Sealed a Warrant, and *Read* also Signed and Sealed the foresaid Defeasance annexed thereto, which being delivered mutually by both parties; *Dawson* came at the time appointed, (viz.) two dayes after, to receive the 300*l.* according to agreement, but could have no more paid him then 158*l.* which was repayed by *Dawson* to *Read*, and his appointment in *London* by the time limited and allowed in the Defeasance, (yea in truth two dayes before) with 15 pounds more, which was lent by him to *Read*, to be repaid upon demand; upon which payment *Dawson* call'd for his Warrant of Attorney, which *Read* at that time put off

off with this excuse, That he had forgot, and left it at his house in the Country, promising the delivery of it as soon as he returned to *Norfolk*; but not performing his word, *Dawson* made several times other demands of the said Warrant, but had for answer, It was lost: Yet before several persons of Repute and Credit, *Read* acknowledged himself fully satisfied by *Dawson*, and nothing to remain due to him from the same. However, Sept. 12. 1657. *Read* having privately, without the least knowledge or suspicion of *Dawson*, entred that Judgement, took out Execution upon it, against the goods of *Dawson*, and by virtue thereof did levy in the County of *Norfolk* to the value of 700*l.* and after sent one *Thomas Hide* into *Huntingtonshire*, who by his order, without Writ of Execution, or any other Authority but his direction, took away 47 fat Bullocks, worth 200*l.* and sold them; nor content with this, he in the same year and month, in the County of *Norfolk*, at a place called *Wallpool* in *Marshland*, did by Colour of the said Execution, seize of the proper goods of the said *Dawson*, viz. Hay (in Stacks and Reeks) to the value of 500*l.* which though he had no power to condemn and dispose of, yet he detained by colour of his own Execution, till he could, and did procure one *Robert Dunn* by a pretended Execution to Levy the same, and sell it.

Upon which illegal abuse, *Dawson* made complaint to the then Judges of the *Kings Bench*, (in those dayes called the *Upper Bench*) by whose order, *Read* was committed Prisoner in the Custody of Sir *John Lenthall*; but by favour of some of his Fraternity, forthwith had his Liberty, which he employed so well, that before the end of the same Term, he procured one *Disney* to commit wilful perjury, with intent to overthrow *Dawson* in his most just cause, he when *Read* first moved to him that he should make such an Oath, replied, *Master I know no such thing*, who then swore by his Maker, that unless he would make that Oath, as he directed him, he was utterly undone; so partly by importunity, partly by promises, he procured the said *Disney* desperately to swear against his own knowledge; Whereupon *Dawson* indicted *Disney* for this perjury, and his Master for subornation thereto, since which *Disney*'s Conscience accusing him, he hath confess to several persons of worth and repute, that his Master *Read* would ne-

ver permit him to be at rest, till he had perswaded him, to make Oath of such things, of which he had not the least knowledge.

For which Cause in *Easter Term 1658*. *Dawson* filed a Declaration in the *Kings Bench* against *Read*, (who did, and still doth practise there as an Attorney) upon the Case, in a special Action, which the first of *July* he brought to a Tryal, and recovered 700*l.* damage, besides costs of Suit, 18*l.* for which the following *Michaelmas Term* he had Judgement, and Execution granted thereupon, against the person of *Read*, which Writ being delivered to the Sheriff of *Norfolk*; the busynesse was so jugled between them, that although *Read* was often in the Sheriffs Company, yet he was not taken in Execution, nor would the Sheriff at the instance of *Dawson* return the Writ, for several Terms, and at last returned a *non est inventus* thereupon, when *Read* during the time of detaining this Writ, without Execution or Return, had emboyled *Dawson* in a tedious and chargeable Chancery Suit, which because of its Exemplary Injustice, and Corruption, discovered in the manageing thereof, shall be particularly here set down.

Not long after, *Dawson* had got against *Read* this Judgement, and Execution; the Defendant sues for relief in Chancery, and serves *Dawson* with a *Subpano* to that purpose, and proceeds the Vacation following to examine witnesses, and by favour with the Master of the Rolls (*William Lenthall*) procures the cause to be forthwith set down for a hearing in *Easter Term* (suddenly then following) 1659, which Term being adjourned, the Cause was again set down for hearing at the Rolls, the 9th. of *June* following, where as soon as it was opened by *Reads* Counsel, *Lenthall* (the Conscientious Master of the Rolls) called for *Dawson*, and in seeming familiar friendship told him, he would make a bargain with him, (*viz.*) that *Read* should within two dayes pay him Four hundred pounds, and the differences between them made up, and fully ended thereupon, to whom *Dawson* replied, his debt was 718*l.* in recovery of which it had cost him no lesse then 500*l.* When *Lenthall* saw that this bait would not allure *Dawson* to bite at it, who had sufficient former experience of his corrupt basenesse, and dissembling villainy, (as before the Close of this discourse shall be discovered in another case,) he then demanded of *Reads* Counsel, if they could produce any Presidents, where relief in Equity, had been granted,

granted , in the like case after recovery, Judgement , and Writ for Execution, who replied, there were several Presidents, upon which answer, *Lenthall* put off the hearing till the 18th. following, of the same month , against which time he willed them to have those presidents in readinesse , and then he would determine the Cause ; but in the mean time tyed up *Dawson* not to take *Read* in Execution: the appointed day for hearing being come , upon reading the first president , *Lenthall* told them plainly , it made not at all for , but against them ; but he had since the last hearing, Considered of the Cause on his pillow , and so forthwith , without farther hearing Counsel on either side , ordered them to go to a new Tryal at Law , after which he would reserve the Equity to himself ; but in the mean time *Read* should not be taken in Execution , with which orders *Dawson* being much aggrieved, Petitioned the then Lords Commissioners of the Great Seal (as they were called) complaining of the great injustice he suffred thereby ; in answer to which Petition , they granted him a rehearing before them , upon which, Counsel having spoken on both sides, they dismist *Reads* Bill , and discharged the severall orders made by the Master of the Rolls , with costs to be taxt by a Master of *Chancery* , which were accordingly taxed at an hundred marks ; Whereupon Sir *John Lenthall* (one of the Rebel *Olivers* mock Knights) Son to the Master of the Rolls , being at that time a Member of that thing, then called a Parliament , seeing *Read* thus left to the Law, (notwithstanding his honest Fathers devices to obstruct the same) gives him his protection during the sitting of that Convention.

Read finding himself thus countenanced, by the Master of the Rolls and his Son, (for which as himself confesseth, it cost him three hundred pounds) thinks he is now armed *Cap a pe*, for any villany, and having a prodigiously villainous wit , goes thorow stetch to the purpose , and thus performs it. First he persuades and prevails with one *Robert Dan* , that he might make use of his name , (at his own charge and costs) to confess, and enter a Judgement against *Dawson* ; for the Sum of 350 l. upon which grant , *Read* as representing the person , and taking upon him the name of *Richard Dawson* , forged the foresaid Warrant of Attorney , Subscribes and Seats it , as if himself had been the

person of *Dawson*, and then delivers it to the use of *Robert Dun*, having witneses in readinesse, (who upon examination affirm that they knew neither the persons of *Read* or *Dawson*) to subscribe to the delivery thereof as the *Act and Deed of Dawson*.

Upon which Warrant so given by himself, he procured a Judgement to be entred, and Execution taken out, and levyed on the Goods of *Dawson* in the County of *Norfolk*, where by a Combination between him and the Sheriff, with his under Officers, (who knew very well the Judgement to be grounded upon a forged Warrant of Attorney before the Execution of the Writ,) 1000*l.* worth of Goods were seized and sold, yet valued but at 150*l.* which Goods so under valued, were bought by one *John Prat*, whom *Read* procured to buy them upon a joynct account, between them both.

Which 1000*l.* being thus swallowed up between these two devourers, and the Execution still unsatisfied more than one half; in the next place, *Read* sues forth a Commission of Bankruptcy against *Dawson*, in the name of *Dun*, for the unconscionable remainder of the pretended Execution; to sit upon which, he pickt up Commissioners of his own Confederates, who in a very short time after the Commission came to their hands, declared *Dawson* a Bankrupt, and discharged *Read* from payment of any monyes to him, no other pretence of Debt, being brought before these Commissioners to prove this Statute against *Dawson*, but only the forged Warrant for Judgement, as is before at large recited, and testified by those very witnesses who were present at the Sealing and Delivering that Warrant of Attorney, who deposid that *Read* (whom then they had no personal knowledge of) Subscribed, Sealed, and Delivered it, in the name and counterfeiting the Person of *Dawson*.

Things being thus corruptly and unjustly carryed, *Dawson* to prevent (if possible) the ruine, which he saw inevitably hanging over the heads of himself and Family, unlesse such villanies were redressed, in Michaelmas Term 1659. made his complaint before the Judges of the *Kings Bench*, of the fore-recited horrible Forgery of *Read* in his name, as also of false witness, which were suborned by him, and in readinesse to swear that *Dawson* was the very person, who Signed and Sealed the Warrant of Attorney, to the use of *Dun*; upon which complaint the

Court

Court, referred, the matter of fact in the Case to the examination of Mr. Herne Secondary of the same Court, who upon examination of *Dun*, and several other witnesses, found that no monyes were due from *Dawson* to him; but on the contrary, *Dun* was indebted to *Dawson* in the Sum of 400*l.*, due upon Bond, who had a general release from him under Hand and Seal, before the forging that Warrant of Attorney, (by *Read*, in his name) nor did ever *Dawson* deal with him since, as he hath confessed in the hearing of several persons; To make which more evident, *Dawson* hath now from *Dun* a Judgement upon Record, acknowledged by himself, for that same debt of 400*l.* then due when this forgery was committed, *Dun* having moreover confessed on his Oath, that *Read* to acquit himself of the Judgement for 718*l.* and 100 Marks Costs, did Sollicite him to consent to, and own this forgery, and suing forth the Statute of Bankruptship against *Dawson* thereupon.

Mr. Herne having carefully sifted the whole truth of the Case, made thereof a just report to the Court, who thereupon ordered a Tryal at Law, and the rule was, that this Tryal should be (according to the Election of *Dawson*) at the next Assizes in *Norfolk*, or *Suffolk*, upon a feigned Action, whether the Warrant of Attorney were the Act and Deed of *Dawson* or no, which if upon tryal, the Jurors should find in the affirmative, then the monyes in the Sheriffs hand (made of the goods levied in Execution) to be delivered to *Dun*, but if they should find in the Negative, then the Judgement to be vacated, and the moneys restored to *Dawson*; *Dawson* upon this order moved, that the Tryal might be either in *London* or *Middlesex*, where the Forgery was committed, because at so great distance, Knights of the post might stand for substantial witnesses.

Yet in this he was overborne by the Court, and the Tryal ordered in one of those two Counties, who because he could have it no better, chose of two Evils the least, and had his Tryal at *Bury St. Edmonds*, at the Assizes holden Sept. 10. 1660. for the County of *Suffolk*.

Read making Cock-lure of the Tryal to goe on his side, being at such a distance, carries down the Record, and with it Witnesses that knew how to swear home; *Dawson* also knowing the justice of his Cause, fearing the other should neglect it,

(though Defendant) he also carried the Record with him , to tryal , in case *Read* , and *Dun* should not ; So two Juryes were Impannelled , one on the Plaintiffes , another on the Defendants score ; And although *Dawson* might have just caufe to fear the packing of a Jury , on the behalf of *Read* and *Dun* , whom his former experience had taught him , to be notoriously villainous , yet trutting to the righteousnesse of his Cause , rather than contend , was content to lose the benefit of his own Record , and proceed to tryal by their Jury .

Who being sworn upon the Case between *Dun* and *Dawson* , *Read* who was at the charge of that Tryal , and carrying the witnesses out of *London* , as hath been since confessed upon Oath , by the Plaintiff *Dun* , and several other witnesses , and may be concluded by this undeniable Circumstance , that *Read* gave Ten thousand pound security , to the Warden of the *Fleet* , to whom *Dun* was then a prisoner , to have him personally present at the Tryal to own the same , yet this *Read* appears as one witness in the behalf of *Dun* , and swore that Warrant of Attorney was a true Warrant , and Signed and Sealed by *Dawson* to *Dun* , for 220*L* which *Dawson* owed him , although in truth *Read* did himself Forge , Sign , and Seal that Warrant , as hath been already said , and also made appear by Oath upon Record .

Having thus led the Dance , he next produceth another witness like himself , to confirm his testimony , who went by the name of *William Holmes* (which name also , was so subscribed to the Warrant of Attorney) but that person being dead , this Counterfeit swears positively , that he was the same *William Holmes* , who subscribed his Hand to that Warrant of Attorney , which he upon Oath said , was Signed , Sealed , and Delivered by that same *Richard Dawson* , who was then Defendant in that Cause ; But it was discovered in Court , that this pretended *William Holmes* , was indeed *Isaack Harding* a Scrivener , now and for thirty years last past dwelling in *Swan-Alley* near *Holborn-Bridge* , and was hired by *Read* for the Sum of 45*s* . paid him in hand by his appointment , besides what was promised him afterward , to make that desperate Oath , which he knew to be false in every Circumstance of it .

Now how God was pleased to discover the falsehood and perjury of these Villains , whose feared Consciences durst attest
his

his Divine Majesty so solemnly, yet so falsely, it will not be amiss to declare briefly.

In the time of the hatching, and prosecuting the afore-mentioned Villany against *Dawson*, one *Thomas Gunning*, was by *Robert Dun* perswaded to goe to a certain person, unknown (but only to the Procurers and Abbetters of the intended Cheat) to make demand of 220*l.* of him (as if he had been *Richard Dawson*) which sum he was to pay unto him upon Defeasance of a Warrant of Attorney, to confess a Judgement for 350*l.* which *Dun* told *Gunning*, *Richard Dawson* had Signed and Seal'd, and that Party to whom he sent him, was the same person; *Gunning* (at that time not knowing *Dawson*), made demand accordingly; That Counterfeit person owning the name of *Richard Dawson*, promised payment of the Sum demanded in a Weeks time; Of which demand, and an answer thereto returned, by the supposed *Richard Dawson*, *Gunning* (being perswaded by *Dun*) made *Affidavit*: The true *Dawson* hearing this news, so strange to him, testified upon Oath, was alarum'd thereby to look about, and being Authorized by an Order, to bring in this Deponent *Gunning*, to see if he would make good his Deposition the whole Plot was in part discovered, for seeing the true *Richard Dawson* in presence, he not only upon his Oath denied him to be the same, of whom he made the aforesaid demand of 220*l.* (who then professed himself to be the same Party) but also Deposed, that *Dun* in the name of *Read*, had offered him 40*l.* to swear that Warrant of Attorney to be the Act and Deed of *Dawson*, and bringing him to *Read's* Chamber in *Davids-Inne*, there *Read* himself proffered him (in Case he would so make Oath) to maintain him at his Country-House, furnish him with a good Horse, and give him forty pounds in money, as is at large declared in the Deposition of *Thomas Gunning*, before the Right Honourable Justice *Mallet*, taken July 27. 1660.

This first light in short time (with Gods blessing) discovered the whole design; For afterward, *Richard Ramsey* one of the witnesses to that Warrant of Attorney, being Subpoena'd by *Read*, four dayes before the Tryal at Bury Assizes, at his Chamber in *Davids-Inne*, to be witness in the Case between *Dun* and *Dawson*, there *Read* proffer'd him five pound in hand, to swear that

that the Defendant *Dawson* did Sign, Seal, and deliver that Warrant of Attorney, to the use of *Dun*, he when he came in Court ingeniously related the truth, *viz.* that he was present at signing, and sealing that Warrant of Attorney, and subfcribed his Mark as a Witness thereto, but then knew not either *Dun* or *Dawson*, but since knowing both, he on his Oath affirmed, *Dawson* not to be present at that time, but *Read* was the very person who signed, sealed, and delivered it in the name of *Dawson*; he also upon Oath declared the proffer of five pound in hand, made him by *Read*, in case he would swear as was before related; also, that then, and several other times, he saw *Read* give *Dun* money to prosecute the said Suit of Forgery, and that *Jacob Wrag*, Clerk to *Read*, told him after the Tryal, that had not he been at *Bury Assizes*, his Master *Read* and *Dun*, had overthrown *Dawson*, by the evidence of *Isaac Harding*, who there swore by the name of *William Holmes*.

Which *William Holmes* being then dead, on his death bed did declare, that he was follicited, but was not witness to the Warrant of Attorney against *Dawson*, to *Dun*, yet his name was subfcribed, his person and hand counterfeited; and though at the Tryal he were dead, yet *Harding*, who as a Scrivener had attested several Leaſes, and Deeds, (for above thirty years space) by the name of *Isaac Harding*, for the sum of forty five ſhillings, paid in hand, (besides what was afterward promifed) he desperately swore what he knew to be falfe, under the counterfeit name of *William Holmes*, whose name and hand, was at first only forged, as before was ſaid.

Thus it pleased God to defeat the Devices of these two malitious desperate Villains, and to discover their forgeries, fo that the old perjured Wretch, that swore by a disguised name, got nothing by his counterfeiting, and forswearing himself, nor those who employed him, but a bare detection of their Villany, to the confuſion of themselves, and the amazement of the hearers.

Dawson having this ground to work upon, proceeds to the examination of *Dun*, whose Conscience beginning to relent, had compelled him to acknowledge what he had acted against him, to ſeveral of his acquaintance; which he hearing of, procured his examination before the Right Honourable Lord Chief Juſtice

Rice Foster, Nov. 26, 1660. who there upon Oath confessed, that the Warrant for Judgement to an Attorney, and Commission for Bankruptcy, sued forth thereupon, were both carried on in his name, by the instant importunity of *Read*, and at his Costs and Charge, with design only to defraud *Dawson* of the 718*l.* Judgement recovered by him against *Read*, and the Costs taxed in Chancery upon the dismission of his Bill, by the Lords Commissioners, and that he did verily believe, the Commissioners, who sat upon the Statute taken out in his name, did declare *Dawson* a Bankrupt, under their hands and seals, only at the request, and importunate desire of *Read*. He also confirmed upon his Oath, *Reads* suborning *Isaack Harding*, to swear at Bury Assizes, under the false borrowed name of *William Holmes*, that he saw the Warrant of Attorney, which was made to *Dun*, for 350*l.* signed, and sealed, by that very *Dawson* who appeared Defendant in that Case in the Court, for which Oath so to be made, *Read* gave him forty five shillings in hand; Likewise, that by the Confession of *Read*, as well as the information of divers credible persons, he was assured, that *Read* was often in company with the Under-Sheriffe of *Norfolk*, during that very time, he had a Writ of Execution against him, (at the Suit of *Dawson*) for a Judgement of 718*l.* recovered by law. And lastly, that one *Jacob Wrag* (Servant to *Read*) came to him (the Deponent) in his Masters name, to desire him not to discover any of these things before mentioned, and for so doing, he would be careful for him, and not suffer him to want.

Thus, at length was made a compleat discovery of all the windings and turnings of these Serpentine Monsters in Villany, one of them, in whose name, and by whose industry (in great measure) things were thus corruptly (or rather hellishly) carried, upon his Oath discovering himself, and accusing, and so branding his wicked partner, with a black note of infamy, not to be wiped off by all the cunning he, or his accursed Tutor in these Forgeries, Perjuries, and subornation to perjury, can find out, or invent. To God the true Author of this discovery, be ascribed the sole praise, and glory thereof.

The several chief heads of the testimonies of these three Deponents, I thought fit here to set down with what perspicuity

and brevity I could, (not swerving in the least from the true intent and meaning of the Affidavits themselves) which are at large upon Record, taken before Honourable Persons, as was before touched in each of them ; the name of the Right Honourable the Judge , before whom taken, being particulary remembred, in giving their testimonies in brief, for the Readers fuller satisfaction, and further confirmation.

To which I might adde many more of the like Kind , thirty several at least , but that I here account needless , since in the mouth of two or three witnesses , each thing in controversy, is, and ought to be confirmed , and here we have not only witnesses , but (*ipso fatentes ricos*) the persons concerned in the forgery , (either ignorantly or knowingly, drawn in thereto,) upon Oath confessing against both themselves , and one another , which is a testimony as firm as can be desired or expected.

I shall now speak a little more particularly to the Statute of Bankrupchis , sued forth by *Read* in the name of *Dawson* against *Dawson*, and firm'd by Commissioners pickt, and packt for the same purpose, only to discharge *Read* from paying any monies to *Dawson* , whose just debt, upon a legal recovery was upward of 800 *l.*

For taking forth ; and granting, or affirming the same, *Dawson* brought his action against *Read* , and those Commissioners, his Confederates ; and upon Tryal in *Jan.* 1660. recovered against them 500 *l.* notwithstanding which, upon an *Affidavit* of *Reads*, read openly in the Court, at the *Kings Bench Bar*, a motion was made to have a second hearing , which was had by the consent of both Plaintiff and Defendants the *Hillary Term* following; where *Read* (according to his old wont) procured in readinesse four several witnesses, to swear *Dawson* a real Bankrupt, (*viz.*) *Thomas Wigge*, one of Honest Sir *John Lenthalls* Engineers , a villain so notorious in that kind, that if in any Case, (where he is well paid) his Evidence come short, (that is) be not sworn home enough, blame the Lawyer that gave him not better and larger instructions, and not him , who wants only to be informed , what manner of Oath will serve turn ; then as for performance, let him alone for one. The second *Jacob Wragge*, servant to *Read* , one who had learned so much of his Masters qualities , that no wise man can trust his Word , or be-

believe his Oath ; the third *Robert Coghill*, a neighbour to *Read*, who by this hopeful beginning gives great assurance, what a compleat Knight of the Post he may prove in time, if he continue the acquaintance, and follow the direction of *Read* ; the last, *Thomas Adamson* formerly a Clerk to *Read*, who it seems still wants his help at a dead lift, (knowing his abilities) though at present he hath left his Service: These four, being pre-instructed, could (if occasion had required) have sworn any man of dealing, in *England* a Bankrupt ; for to give them their due, in their depositions, there wanted nothing but Truth, Malice enough, and Formality sufficient, with a home shot to reach the mark aimed at by *Read*, their Tutor, who put cruel words of falsehood into their mouths, and told them what manner of Oaths would serve his turn, and they accordingly swore as dangerously, desperately, and resolutely against the Credit and Reputation of their innocent Neighbour, whom some of them knew not, others very little ; all of them, knew certainly that what they swore against him, was absolutely false, and so God by his providence hath plainly since discover'd it to be, to the great shame of those poor perjured wretches ; but most especially of that Monster, who suborned them to doe it, as he had done others often before.

For which wilful perjury (palpably now detected) these four abovenamed, stand indicted at the *Old Bayly* in *London*, by *Dawson*, who doubts not, but to have them brought to Con-digne, and Exemplary punishment.

Thus have I in brief decyphred out to you, a great Monster in villany, as in a Landskip, given you a large volume of Roguery contracted into an Epitome, a short narrative of what to his cost and trouble, *Dawson* (who hath still been the sufferer hitherto) hath felt for these many years, to the ruine almost of his Wife, Children, and Family, and whose Case or Lot may it not be next ? nay who can escape for future ? if such Villanies be countenanced, as they will be if not prohibited, and severely punished to the terror of others ? It is reported of a Bravoe, that he would vauntingly boast, how he had at his beck ready an hundred to swear for him, an hundred to fight for him, and an hundred more to supply him with money.

The thing, (though I cannot affirm the number) is most true

of this *Read*; who as for swearers, hath made his boasts, that he is so provided with a stock of them, as never to fail in any Case, and that his manner of dealing with such Knights of the Post, is suitable to that of the Dutch before a Sea-fight, with their Mariners, *viz.* to give them 20 or 30 glasses of Sack, just before they come upon their Oaths, then (quoth he) they are fit to serve my turn, and swear resolutely, bravely, and boldly, without making the least scruple of any thing that is told them makes absolutely for the good of the Cause depending, to have it sworn either thus, or otherwise.

And for fighting (or rather maintaining his quarrel,) 'twould make a man blesse himself to see prodigious Villains so favoured, before one that manageth a Cause as just as Justice it self, (having been so often determined just, by the reiterated Sentences of Common-Law, Commissioners for Equity, &c.) How did the honest Master of the Rolls (Speaker to the reformatory Rump) endeavour to entrap *Dawson* in favour of *Read*? How was *Read* with great charge, brought into a Prison, where he deserved to lye till death, yet (*Presto be gone Sir.*) discharged forthwith, and *Dawson* brought in upon a large Scroll of Fob'd Actions, to keep the other, and such as he procured to commit Perjury wilfully and maliciously, from Condigne punishment? How ready was the Sheriff of Norfolk to Execute a Writ upon a forged Warrant for Judgement, against *Dawson*, and yet knew it to be so, (using this expression, He would Execute 1000 the like, if they were brought to him, and Goods of *Dawson* to be found in his Balywick; yet how loth, nay absolutely unwilling to Execute a true Writ, upon a Judgement, justly recovered, in Court, (after the discovery of a pack of Roguery) against *Read*, though oft in his Company, nor would be persuaded to make return of the same, till *Reads* Cockatrice Eggs of Villany were hatched? How have the Gaolers, and their setting dogs, complied with this perjured Moniter and his Confederates, to ruine one in defence of the other? *Portington*, a Condemned Debtor to *Dawson*, and Prisoner to Sir *John Lenthal* in Execution, having liberty to choose whether he would live in restraint or no; and *Read* cast into Prison, for Perjury, and Subornation thereto, Forgery, personating other men, and taking upon him their names, not without great cost and charge.

charge to the Plaintiff, yet he in short time, let out, upon inconsiderable Bayl, though Dawson wrongfully imprisoned upon feigned, false Actions, maliciously brought against him, to hinder his prosecuting these so abominable Villains, hath not liberty to remain in one prison; but is tost (like a Curr in a blanket) from Gaol to Gaol, to a vast expence of monyes, nor without danger to his person, being this present Term, removed from the Fleet (where he was so happy, as to be free from grosse incivilities,) to the Kings Bench, where the Keeper Sir John Lenthall, for a base bribe, hath injutly (yet much like himself, and his Brother, the *Quondam* Ravenous Master of the Rolls) suffered *Portington*, a Prisoner in Execution, at his Suit, to have free liberty, these many years, to the defrauding his greatly oppressed Creditor, and his extraordinary damage; and is now become a deadly Enemy to Dawson, because he sues him for an Escape.

I might be large here, but that I study and must affect brevity; In a word then to close this sad discourse concerning this bad Subject, I wish only that the effect and tendency of such practises would be seriously weighed, which is no other than the total subversion of all our Laws, and destruction of civil polity; for if all that is recovered by legal processe, may be so evaded, and detained from the Plaintiff, and Costs multiplyed by vexatious after hearings, his Estate pluckt away violently, by forged Judgements, and these proved true and real by wilfull perjury, till the party thus wronged hath hoc monyes left him to prosecute such injuries, or to make a motion in Court, yet when this is discovered, and openly made to appear, the parties doing the wrong, be not curbed, and discountenanced, what hopes can an honest man have for future in a just and righteous Cause, well then may we cry out with the Philosophers, *flat In�itio, aut ruet Calam.*

Willingly could I now throw aside my pen, but that more injuries compel me to a farther complaint: From relating the Villanies of an Attorney; I would next proceed to match him with a pair of as great Villains as himself, in his own profession, viz. a Sollicitor and a Counsellor, which three, if the Devil had a Cause to be prosecuted, he could not be better fitted with a leash of Lawyers.

But before I come to a survey of their Villanous actings, I shall relate a short particular Case, which for ought I know hath no relation to any of the rest, but was carried on by the Conscientious Master of the Rolles, and a Kinsman of his (as very an honest man as himself) to the Dammage of *Dawson* at the least 2000*l.*

About the year 1649. *Dawson* Commenced a Suit with *Matthew Binkes a Graftier*, for a great summe of money, which he injuriously detained from him, and by Law recovered 805*l.* and had Judgment entered for the same, *Binkes* brings his Bill for relief in Chancery, whereupon after a tedious Suit, and great Expences (the Commissioners for examination of witnesses, sitting above a hundred and eighty miles from *London*,) at last the cause came to hearing, before the honest Speaker *William Lenthal*, at the Rolls, who perswaded *Dawson* to referre the matter to a person whom he should name, promising to name an honest indifferent man, a stranger to both their persons, and the Cause; but scorning to be as good as his word, nominated a Kinsman of his own, by name *John Nabbs*, whose Son was Sollicitor in that Cause against *Dawson* for *Binks*, and pleaded it before his Father so effectually, that *Nabbs* gave away the Judgment of 805*l.* from *Dawson*, and moreover, ordered him to pay 44*l.* 4*s.* 6*d.* costs to *Binks*, a strange order, which could not be expected otherwise, considering how it was brought forth, for neither *Dawson*, or any friend of his for him, was present or heard, but only *Binks* and such who spake on his side, the chief of whom was *Nabbs* Son, a Sollicitor retained by *Binks*.

Nor was the Judgment only given away, but *Dawson* ordered to acknowledge satisfaction for the same upon Record, which he refusing, appealed to the then Lords Commissioners, *Lisle, &c.* who without proofs or allegations, ordered *Dawson* to be committed Prisoner to the *Fleet*, until he submitted to perform the order of *Nabbs*, whom the Master of the Rolls had impowered to hear, and finally determine that Cause without appeal.

Nabbs understanding that *Dawson* questioned his decretal order, in a most unjust revenge, further ordered 180*l.* more to be paid to *Binks* for costs, which payment *Dawson* refusing, a Serjeant

Serjeant at Arms was commanded to seize and imprison him, till he did acknowledge satisfaction on the Judgment for 805*l.* pay the first 44*l.* 4*s.* 6*d.* and the other 180*l.* awarded for Costs, and give a general Release, never more to question *Binks*.

Now the injustice of *Nabbs* decree may easily be evinced, for that the Master of the Rolls, before *Dawson* consented to the reference, proffer'd to give him by decree, 380*l.* (taking the rule of those Conscientious Jurors, who at a venture hang half, and save half,) which *Dawson* refusing as unjust, and too much damnifying him, at last consented to a reference, where such a Referee was appointed by *Lenthal*, who gave not only the judgement away wholly, but above 200*l.* more, for imaginary costs, refusing to hear any testimony on *Dawson*s side, but peremptorily binding him up to his determination, upon pain of imprisonment, to avoid which, *Dawson* was a long time hunted from County to County, by the Officers of the *Fleet*, and at last finding such a fugitive life, to tend to his absolute ruine, he was enforced to submit to this monstrous piece of injustice, not seeing then any hopes of remedy. *Lenthal* being a man so powerful, and *Nabbs* supported by him, that not to yield to them then, signified nothing else but present ruine, they being able to crush at their pleasure whom they listed.

He that knows the manner of dealing of the Master of the Rolls, may give a shrewd guesse at what it cost *Binks* to purchase this piece of injustice, who thriv'd so well upon it, that he who then was visibly responsible for such a debt trebled, is now as far from being master of a tithe of such a summe, as he was then from honesty; from whence may be concluded undeniably, that at the long runne, honest dealing will prove the best policy.

And now I am at leisure to take notice of, and lay open the injuries wherewith I have been, and still am oppressed, by the procurement of two Lawyers, a Counsellour, and a Sollicitor, Brothers in Profession, Name, and Villainy, *Francis Lutterel*, and *Edward Lutterel*, who both write themselves of *Grayes-Inne*, but their practises have been so basely foul, and grossly corrupt, as may justly be the shame of all the Innes of Court, which I hope will shortly spue out such, (I will not say Villains

lains, because they are Lawyers) but who are the scorn and shame of the long Robe.

Edward Luttrell, who practiseth as a Sollicitor, was in that Capacity emploied by *Dawson* for several years, who was indeed the chief means of his subsistence for that time, he having not bread for either himself or children, but what was bought with the money wherewith *Dawson* relieved him, who thought he had so engaged him by many kindnesses, that he might boldly commit his very life into his hands, as he unadvisedly intrusted him with his means of livelihood, almost to his utter undoing, as shall be particularly related with as much brevity as I can.

He as I said being employed by *Dawson* as a Sollicitor, was acquainted with the forgery, and unjust devices of *Read* and *Dun*, intended for the ruine of *Dawson*, who, as soon as by his industry, and Gods blessing thereon, he could get together 500, or 1000*l.* worth of Goods, would immediately with Executions taken out upon forged Warrants sweep all away.

Dawson at that time having in the County of *Norfolk* at *Watpool*, Hay to the value of about 1200*l.* being at least six hundred Load, which at that time might have been sold in the place for forty shillings the Load, or thereabout, and a short time of some months interest in the Land on which it grew, and then stood made up in Stacks, in which time the grafts upon the Land, was (for feeding Cattle) worth at least a brefscore pound or upwards. *Edward Luttrell* persuaded *Dawson* for avoiding the malicious mischief intended against him by *Read* and *Dun*, to sell and make over those Goods and Leafes to him, out of which he would discharge 402*l.* 10*s.* 2*d.* which *Dawson* was ingaged to several persons for, and bring him into his purse 500*l.* more, and himself defray all incident charges.

Dawson confiding in the honesty of *Edward Luttrell*, consents hereto, and gives him a Scedule particularly mentioning all his Debts, to whom due, and when payable, summed up in the Total, as was above exprest, in Consideration of the payment of which, and the Sum of 500*l.* over and besides to be paid to *Dawson* by *Luttrell*, he consents to the making of an Indenture of Sale, which was accordingly made by his Brother *Francis Luttrell*

*Luttrell the Counsellor, with the Schedule of Dawson's Debts annexed to the Deed, which Edward Luttrell upon receipt of this Deed, undertook to discharge, and for ever to aequit Dawson from, and every part of them, then and there assumping, and faithfully engaging his promise to pay to Dawson 500*l.* over and above the Debts; This Deed was made July 25. 1659. as by it and the Schedule doth more at large appear. Edward having gotten this Estate in his hands, began to slight Dawson, bidding him pay his Debts himself, nor did he either satisfie them as he had ingaged, nor pay to Dawson one penny, according to his Assumption, and faithful promise.*

*Dawson being thus deluded, and unworthily dealt with, addresseth himself to the Counsellor (Francis Luttrell) who had promised, and undertaken to him, that his Brother Edward should fully perform and make good his promise, or he in default of him would himself make it good, but he was so far from performing what he promised, that he threatened Dawson, that in case he sued or molested him upon the score of his promise, he would grind him to powder: his Brother Edward boasting, that before he should pay to Dawson, or for him, one Groat, the Counsellor his Brother would furnish him with a 1000*l.* to spend in Law.*

From which time both the *Luttrells*, have most maliciously combined with *Read*, the old implacable Enemy of *Dawson*, and other of his associated Confederates, to avoid whom was the first pretence used, and urged by *Edward Luttrell*, to induce and perswade *Dawson* to make over the Estate unto him.

Which by his own words and Confession, as is testified upon Oath by one of his acquaintance, was worth more than 1000*l.* and made over to him upon that Consideration, that he should first of all pay Debts, to which he agreed, and promised the same, but said he would neither do it, nor give *Dawson* an account of his Estate, of which Intention, being demanded the reason, gave this, that he had got into his hands the whole by which *Dawson* intended, or was able to pay his Debts, or live upon, and therefore was resolved if he would keep himself but honest, he would keep him poor enorgh; Which word of his he hath kept to his ability, For when ever *Dawson* brought his Action against one or both of them, at Common Law, they would sue for relief in Chancery, as namely that the Goods were but only made over to *Edward* in trust, for the use of *Richard*, and so that Condition of payment of Debts, &c. to be only *pro forma*, and not intended to be interpreted to the prejudice of *Edward*; upon which

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Which by his own words and Confession, as is testified upon Oath by one of his acquaintance, was worth more than 1000*l.* and made over to him upon that Consideration, that he should first of all pay Debts, to which he agreed, and promised the same, but said he would neither do it, nor give *Dawson* an account of his Estate, of which Intention, being demanded the reason, gave this, that he had got into his hands the whole by which *Dawson* intended, or was able to pay his Debts, or live upon, and therefore was resolved if he would keep himself but honest, he would keep him poor enorgh; Which word of his he hath kept to his ability, For when ever *Dawson* brought his Action against one or both of them, at Common Law, they would sue for relief in Chancery, as namely that the Goods were but only made over to *Edward* in trust, for the use of *Richard*, and so that Condition of payment of Debts, &c. to be only *pro forma*, and not intended to be interpreted to the prejudice of *Edward*; upon which

which and the like false suggestions, *Dawson* was tied up by Injunction and Orders not to proceed at Common Law, till the Cause were heard in the Court of Chancery, where when *Dawson* preferred his Cross-bill of Complaint, expecting to have the merits of his Cause heard by the Right Honourable the Lord Chancellor; In stead of Answer, he had an old Outlawry, long before reversed, and superseded; pleaded in Bar to his Complaint, to disprove which, cost the said *Richard* much money, besides great trouble and delay of time; To adde to whose incumbrance, and if possible to make him for ever uncapable to prosecute those oppressing betrayers of his peace, *Edward* hath caused to be sued against him most of those Debts which he had engaged to discharge and pay, yet keeps his Estate without satisfaction therefore, or account thereof given to *Dawson*, pretending it was formally made over to him only in trust, which trust he hath made good with a vengeance; But in truth the Goods were absolutely sold; and the Deed of bargain and sale delivered to him (*bonâ fide*) upon which he received them, took them into his possession, sold as much of them as according to his own words would serve his turn, and then complied with *Read* to seize the rest (as *Dawson* goods) which he upon absolute sale, and delivery, had enjoyed and possessed for many months together, with the Land which *Dawson* made over to him, for the full time of his Leases therein, without molestation of *Read*, *Dun*, or any other, and had them also six months in possession after the time was expired, which *Dawson* made over to him by virtue of his Leaues.

Yea when *Dawson* after the Sale and Delivery (being with him in *Norfolk*) advised him to the selling of the Hay, in which he had more insight then *Luttrell*; he bad him meddle with his own busines, for he had nothing to do there with either the Goods or Ground, which were sold and made over to him; And after that, when *Dawson* perceived that he did not pay those debts, he desired of him, that he would either sell the Goods, and make payment, or resign them to some other, who would give security, to indemnifie him, (the said *Luttrell*,) as to his ingagement of paying debts; but he replied, the Goods were his own, which he would neither resign, nor sell, but when he saw his own time. Nor was he ashamed to boast, that he had met with such a bargain from *Dawson*, that he would put 500*l.* into his own purse thereby, which it were strange if he could do any other way, than by cheating him of the whole, and that was the course he took, in which he was encouraged and supported by his Brother.

And

And suitable to the dealing of him, in this Case of Hay and Leases of Land, was another trick of knavery put upon *Richard* by *Edward* about the sale of a Coach, which costing *Richard* 40*l.* he sold it to *Luttrell* for 30*l.* by a Deed of Sale, which 30*l.* he the said *Richard* ordred *Edward* to pay 5*l.* to his Brother *Francis Luttrell*, and 25*l.* to *Richard Norwich*, which payments (so ordred) *Edward Luttrell* did assume and promise to make; upon which only consideration, the Bill of Sale for the Coach was by *Richard* delivered to *Edward*.

Francis Luttrell who ordered the Deed to be made, accepted of this payment from his Brother *Edward*; and did thereupon discharge *Dawson* of the Debt of five pounds, though since the Coach is sold by *Edward*, and the money for it received, and spent, *Francis* makes new demand of the money from *Dawson*, *Edward* refusing to pay either his Brother *Francis*, or *Richard Norwich*, but when sued for this Debt of thirty pounds by *Dawson*; he first by *Levataquerela*, removed it into the Mayors Court, where by his Bill, he pretended himself only a Trustee for the Coach, as before he was for the Hay, though such trusts so discharged, will shortly bring him to be trusted by none.

For these have been his continual Subtriges, first to pretend only a trust in *Dawson* Goods, that he might have colour to sue for relief in Chancery, and there in stead of making answer material to the Cause depending, to plead old reversed Outlawryes in Bar, so that at once *Dawson* is tied up from his legal course of proceeding (by injunctions) and debarred in Chancery to prosecute those his Bills, till he hath with great cost and trouble disproved the pretended Outlawryes to be in force, of which *Luttrell* hath made his brags to several of his Companions, as is by some of them testified upon Oath, and also upon Record.

Not is this all, though it argue a mind as bad as bad may be, but by compliance with the Clerks of Chancery, this *Luttrell* hath not selome penned his own Orders, which have been entred down according to his own words (as can be proved against him undeniably) upon which advantage it is not to be wondred at, that *Dawson* is still the sufferer, when his Enemies profit, are in effect the Contrivers of their own Orders, which no doubt (having that liberty) they pen with the greatest advantage for themselves; To prove which Charge real, the last Order which was left for *Richard* at the Registers Office, was every word thereof, the hand-writing of *Edward Luttrell*, which he hath in readinesse to shew, in case it be required of him.

Now how sad the Case of *Dawson* is, may be collected briefly, if we consider his present Condition, and compare it with what he was formerly, one who dealt for at least 20000*l. per annum*. Rented in Land (for feeding of Cattle, and for Hay) 900*l.* annually, and by God's blessing upon his Endeavours, had by his Industry gotten such an Estate, by which He and his Family lived comfortably and plentifully, whose Credit would have past without scruple for 3. or 4. thousand pounds: now to find him a Prisoner, his Estate pluckt away from him by Knavery, Injustice, Perjury, and Subornation thereto, Forgery, and Counterfeiting his Name and Person, by which means he is damnified at the least 800*l.* besides what by his Industry in this time he might have got thereby, in his way of dealing, for Want of which stoney (although he hath made legal recovery of the greatest part of it) he hath Contracted some Debts, which he is unable to satisfy, unless he might have his due from others, one of which Debts due to him upon Judgement (if paid) would discharge every real Creditor that could justly make demand of moneys from him.

But in Read of payment, these honest Debtors to *Dawson*, have all combined together in a mutual engagement never to discharge one Farthing, yet are men of able Estates, *Poringdon* a man responsible, detaining 1297*l. 13s. 4d.* for above 12. years, and putting *Dawson* to at least 1000*l.* charge first and last, in recovering and defending that Judgement against him: In Execution for which, although he hath been 16. years and upwards, one of Sr. *John Lenthalles* (fast and loose) prisoners, yet so he is resolved rather to dye, than to pay a Farthing of this Debt; Read also, against whom *Dawson* hath recovered 718*l.* for his deceitful seizing his Goods by vertue of a Warrant of Attorney (which was satisfied) and 500*l.* against him, and other his Confederates, for Damages sustained by a Commission of Bankruptcy, sued out against *Dawson*, upon a forged Warrant to confess a Judgement, as hath at large been declared, yet he boasts that (rather than pay a Farthing) he will rot in prison, though he hath at command several thousand pounds to maintain him, which with his Land he will so make over to Feoffees in trust, that the Plaintiff shall never get penny, nor know how to find his Estate: And although at another time he took away a thousand pounds worth of the Goods of *Dawson*, upon a forged Judgment, In disproving of which, and discovering the Forgery, Perjury, and Subornation to Perjury, committed therein, it cost *Dawson* several hundred pounds

pounds, and though the order of Court were, that upon disproving that Warrant to be real, the Goods levied in Execution should be returned to the Owner of the same, yet he hath not yet received, nor can get the least satisfaction therefore; Nor will the Sheriff of Norfolk make return of that Writ of Execution, upon which he took away the Goods of *Dawson*, and sold them almost two years since; To which oppressions may be added the giving away a Judgement of 805*l.* recovered against *Binks*, by *Nabbs*, upon Commission granted him by *Lenthal*, then Master of the Rolles, to hear and determine that Causē without appeal, which he determined without hearing *Dawson*, or any Witnessse, Counsellor, or Sollicitor in his behalf, giving away moreover, besides the Debr, 200*l.* and upwards for Costs.

And lastly *Edward Luttrell* upon pretence of securing *Dawson* from the like future plots of *Read*, and his complices, with promise (as hath been related) of paying *Dawson*s real Debts, and bringing an overplus into his purse, for the maintenance of him, his Wife, and Family, hath cheated him of all he had left, his Brother and he now complying with *Read* and *Portington* not only to defraud, but to grind and squeeze *Dawson*, and bring him to utter ruine, (a bad requital of the many years kindnesses shewed by *Richard* to *Edward*, whom he kept from starving) who now if it lay in his power would starve him and his.

And that the falsehood and basenesse of these two Brothers in iniquity may be made more evident, besides the ingratitude of *Edward*, which according to the Aphorism in Ethicks (*Ingratiam si dixeris omnia dixisti*), includeth all that can be spoken evil concerning any person; it will not be amiss to hint in brief, the remarkable honesty of the Counsellor *Francis*, who being summoned by *Richard* at the Tryal between him and his Brother *Edward*, concerning the Debt of thirty pounds, due upon Sale of a Coach, at which Deed of Sale, *Francis* was present, and ordred the making thereof, and thereupon accepted 5*l.* from his Brother *Edward*, which was due to him from *Dawson*, yet he against his own Conscience and Knowledge, swore that the Deed was there made fraudulently, for the defrauding of some Creditors, which *Edward* upon a former Deed of Sale (of Hay and Leafes of pasture ground) made to him by *Richard*, had a year before, undertaken to discharge, yet *Francis* upon Oath declared, that to evade those Debts, the Coach was only colourably made over to *Edward* in trust, and no otherwise, to be redelivered upon demand at the pleasure of

Dawson ; At the time of making which Oath, all of the Long Robe present in Court, blessed themselves to hear him so swear, the Judge telling him openly, that Oath could not be true , or if it were, it would argue himself to be a very Knave : not long after which Tryal the Coach was sold, and the mony shaf'd, but not a penny paid either to *Dawson* or his Order. Now what Justice can be expected against such persons, that can, and dare so swear, let the World Judge ?

Nor was this only a failing at that present in the Counsellor *Francis*, but according to the relation of his Brother *Edward*, to *Dawson* (in the hearing of several persons,) *Francis* the Counsellor, made offer to him (the said *Edward*) of 300 l. Sterling, conditional-ly, that he should make Oath against Sir *Allein Appelby*, that he was one in Sir *George Booths* design, in those times to have brought both the life of that worthy person into danger, and confiscated his Estate, which he in his conceit was just grasping, only wanted such a desper-ate swearer, fully to accomplish this intended Villany; from whom, and such as he is, God of his Mercy deliver each honest man.

For of late *Edward Luttrell*, hath gone from party to party, with whom *Dawson* had formerly any dealing, to procure them to enter Actions against him, and several with whom he never had to do, nor doth know the persons, have by his perswasion, and *Reads*, brought against *Dawson* great Actions, upon which (to the number of 30 and upwards amounting to the Sum of about 1600 l.) he is now deteined Prisoner, of which there is not an hundred pounds due ; but some of the parties dead two years since, in whose names Actions are now brought, others satisfied as long time agoe, nor know of the entring any such Actions at their Suit ; others never known to, or heard of by the Defendant *Dawson*, yet have Actions against him, (viz.) 560 l. pretended to be due upon Bond, unto *William Marriot* and *Thomas Breford*, of whom he never had knowledge, much lesse dealing with them. Also 200 l. entred at the several Suits of *Thomas Osborne*, and *John Bates*, with whom likewise *Dawson* never had dealing, be-sides other Fob'd Actions, too tedious to name particularly.

The greater part of which were not charged upon *Dawson* at his first im-prisonment, although then the *Luttrells*, *Read*, and their Confederates boasted, they had him fast for his life time. To ac-complish which design (to their power) Sir *John Lenthal* (with whom *Dawson* never had to do, more than to sue him for the wilfull escape of *Portington*, whereby he is damnified at leist 1500 l.) this last Easter Term, 1661. by *Habeas Corpus*, fetch'd him over to his prison,

prison, where he was loaded with fob'd Actions, to hinder his prosecution of that escape of *Portington*, and the several indictments of perjury, which are found against *Read*, and such as were suborned by him, and his procurement, among whom one is an Engineer to, and Servant of Sir *John Lenthal*, that keeps many such Cattle, who it is to be feared, serve his turn in the like Cases, oftner, than I hope will hereafter be suffered, or else woe to those whom he and others of such Conscience design to ruine. From which prison with very great costs and charges (which were encreased by the number of feigned Actions) *Dawson* was compelled to remove himself back to the *Fleet*, not accounting his person safe, in the *Kings Bench Prison*, where the Keeper is so great a Confederate with his most malicious implacable Adversaries.

Having thus, with as much brevity as I could, related my great grievances, under which I have long groaned, and for remedy whereof I have tryed many wayes (for divers years) both in Law and Equity ; But by reason of the Corruption of former times, the power, and number of my Adversaries, and mine own inability (at length) to prosecute them in a Legal Course, being reduced by these long oppressions, to great straights, and at present a Prisoner, loaded with many Malicious Forged Actions, to binder my Liberty, upon reasonable security such as my present condition will afford me to procure.

Some of my Creditors by the instigation of *Read*, *Portington*, and the *Luttrells*, having prosecuted me to Judgement, and charged me in Execution thereupon, only to binder my going abroad without charge of an *Habeas Corpus*, or *Day Writ*, which (with the allowance for a Keeper, Chamber-rent and Outgoing Fees) amounting to at least 10 or 12 s. each day, is so great a burthen, that while I am so Confined, or have Liberty at such rates, I can expect nothing but utter ruine to my self, and all that are nearely related, and dear unto me.

Wherefore all other hopes failing me, the last remedy left me, is to fly unto the shelter of the most Honourable, the Lords and Commons in Parliament now Assembled, to spread (most Humbly) my Cause before them, and with all possible Submission to Beg and Implore their Gracious Help and Assistance.

My Case Right Honourable Lords, and Worthy Gentlemen, although private, is not of private Concernment, nor bounded within private limits, for as *Read* hath dealt by me, and mine, so hath he dealt by divers others, twenty Families at least I could name, whom by the like Arts he hath ruined

ruined and destroyed, and several fellow-Prisoners I meet with daily, oppressed by the same courses of injustice, false Oaths, counterfeit Warrants for confessing Judgments, false Actions, under which they are detained, &c. by which ways of unjust vexation, together with the excessive, unreasonable charges which (through the corruption of times) now accompany imprisonment, many are reduced to that extremity that they want for the conveniences of life, much more unable are they, by any means of address to seek for relief.

My Lords and Gentlemen; You are your selves the fathers of Children, whom God long preserve and blesse; Howbeit none of you can promise to them a future immunity from the like miseries, unless this Cockatrice-Egge of corruption and injustice be crushed, which no foot, but such a foot of Authority can do. These unjust vexations, Law Smies, or rather Law Cheats, bringing sweet gain to very many, who though they will not openly defend, yet will connive at such practises, so lucrative and beneficial to themselves, and their dependants.

But considering there is legal profit sufficient, allowed to all honest Ministers of Justice, and what comes in this way, is squeezed out of the heart blood of his Majesties most faithful Subjects, thousands of whom have been ruined in their Estates, Credit, or both, by such illegal proceedings. My case also being so grossly and foully exemplary, that it causeth amazement in all who hear it: I doubt not, but that your Honours and Wisedomes will think of a way of relief, as for all the like oppressions in general, so for your most humble Suppliant in particular, that we may have cause (from our hearts) to blesse God for the happy change of times, when our bowels shall be refreshed, our miseries considered, and our unjust vexations oppressures relieved, by your power, prudence, and justice.

I shall not dare to prescribe any means to so grave, wise, and honourable a Council, but with all humble submission expect and wait for such a remedy as shall appear meet to your judicious breasts, praying the great God (who sits in your Assembly,) so to assist you with his blessing from above, that you may your selves become a blessing to this Kingdom, a Sanctuary to the distressed, a defence against wrongs and injustice, and a refreshment in particular, to

Your poor ruined Petitioner, (if not by
your Piety and justice relieved)

RICHARD DAWSON.

